

Alan I. Schimmel, Esq. SBN 101328  
Michael W. Parks, Esq. SBN 154531  
Arya Rhodes, Esq. SBN 299390  
SCHIMMEL & PARKS, APLC  
15303 Ventura Blvd., Suite 650  
Sherman Oaks, CA 91403  
Telephone: 818.464.5061/Facsimile:  
818.464.5091

*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

LOURDES LEFEVRE, an individual,  
on behalf of herself and all similarly  
situated and aggrieved employees,

Plaintiff,

v.

FIVE STAR QUALITY CARE, INC., a  
Maryland Corporation; Does 1 through  
25, inclusive,

Defendants.

Case No.: 5:15-cv-01305-VAP-SPx

Honorable Virginia A. Phillips

**DECLARATION OF MICHAEL  
W. PARKS RE: NOTICE OF  
LODGING OF SETTLEMENT  
APPROVAL MOTION WITH  
CALIFORNIA LWDA**

Courtroom: 8A  
Date: 12/28/2020  
Time: 2:00 p.m.

Complaint Filed: May 20, 2015

**DECLARATION OF MICHAEL W. PARKS**

**DECLARATION OF MICHAEL W. PARKS**

I, Michael W. Parks, hereby declare as follows:

1. I am an attorney at law duly licensed to practice before all the courts in the State of California and the United States District for the Central District of California. I am a shareholder of the law firm of Schimmel & Parks, APLC ("S&P"). I have been admitted to practice as an attorney in California since 1991, and I am admitted to practice in all federal courts in the state of California. I have personal knowledge of the factual matters set forth in this Declaration and, if called to testify, would and could competently and truthfully testify thereto based on my own personal knowledge.

2. I am counsel of record for Plaintiff Lourdes LeFevre ("Plaintiff") and I am submitting this declaration in support of Plaintiff's Motion for Approval of PAGA Settlement ("Motion").

3. On November 30, 2020, S&P lodged Plaintiff's motion for approval of the PAGA Settlement and a copy of the settlement agreement with the State of California LWDA thereby providing notice of the proposed settlement and proceedings before this Court regarding settlement approval under PAGA.

4. Attached hereto as Exhibit "A" is a true and correct copy of an email we received following submission of the motion for settlement approval and settlement agreement with the LWDA which confirmed the submission of the settlement agreement and motion papers. I declare under penalty of perjury under the laws of the State of California and the United States of America, that the foregoing is true and correct.

Executed this 2nd day of December 2020, at Sherman Oaks, California.

*/s/Michael W. Parks*

\_\_\_\_\_  
Michael W. Parks, Declarant

## **EXHIBIT A**

-----Original Message-----

From: FormAssembly <no-reply@formassembly.com> On Behalf Of DIR PAGA Unit  
Sent: Monday, November 30, 2020 5:13 PM  
To: Arya Rhodes <arhodes@spattorneys.com>  
Subject: Thank you for your Proposed Settlement Submission

11/30/2020 05:12:40 PM

Thank you for your submission to the Labor and Workforce Development Agency.

Item submitted: Proposed Settlement

If you have questions or concerns regarding this submission or your case, please send an email to [pagainfo@dir.ca.gov](mailto:pagainfo@dir.ca.gov).

DIR PAGA Unit on behalf of  
Labor and Workforce Development Agency

Website: [http://labor.ca.gov/Private\\_Attorneys\\_General\\_Act.htm](http://labor.ca.gov/Private_Attorneys_General_Act.htm)